

CITA ONLINE - NEW GROUP MANAGEMENT FUNCTIONALITY

Taxpayers can now edit their Group composition for Corporate Income Tax (CIT) and Tax Credit Benefits (TCB) in CITA Online.

Group Management Functionality

This new feature includes group management functionality for the registration of CIT and TCB groups and summarises:

- the current members;
- the group TIN assigned; and
- the Controller designated.

Each CIT group shall be assigned a CIT group TIN ending in “CIT” (e.g., 123 – 456 – CIT), which shall be referenced when filing a CIT Return or an Instalment Return.

Each TCB group shall be assigned a TCB group TIN ending in “TCB” (e.g., 123 – 456 – TCB), which shall be referenced with respect to the filing of a TCB Return.

Taxpayers are encouraged to review their information carefully and communicate any required changes to CITA at least 30 days before the filing of a return for the relevant group. Please email the changes to support@cita.bm or call +1 441 543 8660.

Relevant Filing Groups & Terminology

CIT groups	<p>Pursuant to the Corporate Income Tax Act 2023 (CIT Act), CIT is charged at the Bermuda Constituent Entity Group (BCEG) level.</p> <p>Section 8 of the CIT Act summarises the relevant grouping provisions, including an annual election to modify the Bermuda Constituent Entity (BCE) members of a Bermuda Constituent Entity Group (BCEG).</p>
<p>Notes:</p> <ol style="list-style-type: none"> 1. The BCE members of an MNE Group may allocate multiple BCEGs, subject to an annual election. 2. Each BCEG designates a Filing BCE (also referred to as the “Controller” in CITA Online) which is responsible for the filing of the CIT return and payment of taxes on behalf of the BCEG. 	

TCB groups	<p>Pursuant to the Tax Credits Act 2025 (TC Act), the tax credit benefits of a Qualifying Bermuda Group Entity (QBGE) are calculated by reference to various criteria determined for the Qualifying Bermuda Group (QBG) of which the Qualifying Bermuda Group Entity (QBGE) is a member.</p>
<p>Notes:</p> <ol style="list-style-type: none"> 1. All QBGE members of an MNE Group are required to be allocated to a single QBG. 2. Each QBG designates a Filing QBGE (referred to as the “Controller” in CITA Online), which is responsible for the filing of the TCB return on behalf of the QBG. 	

Required Actions:

<p><u>Action 1</u></p>	<p>Taxpayers should visit the CITA Online to confirm that:</p> <ol style="list-style-type: none"> 1. The appropriate BCEs have been included in each BCEG, and the appropriate Filing BCE has been designated as the Controller of the BCEG. 2. The appropriate QBGEs have been included in each QBG, and the appropriate Filing QBGE has been designated as the Controller of the QBG. <p>To the extent that changes are required to the membership or the designated Controller of the relevant group indicated in CITA Online, please contact us at support@cita.bm to have the changes made on CITA Online. You are required to provide a supporting letter (see sample correspondence) signed by the Primary User/ Authorised Point of Contact to effect the changes.</p> <p>Any required changes should be communicated to CITA at least 30 days before the filing of a return for the relevant group.</p>
<p><u>Action 2</u></p>	<p>Further, please review and update the Ultimate Parent Entity (UPE) information for every taxpayer account.</p> <ol style="list-style-type: none"> 1. Open the taxpayer account 2. Select the “Profile” tab 3. Click “Relationships”. <p>This page allows you to view and add/edit the UPE information associated with the TIN. Manage Profile Information Rise 360</p>



Sample request letter

"Dear CITA Representative,

We have reviewed the group structure. Please modify it as follows:

Name of UPE		Wintergreen Re			
Corporate Income Tax (CIT)			Tax Credit Benefits (TCB)		
Identify existing CIT groups			Identify existing TCB groups		
Group	Name	TIN	Group	Name	TIN
Group 1	BCEG – Winter (Bermuda) Ltd.	123-456-CIT	Group 1	QBG – Winter (Bermuda) Ltd.	123-456-TCB
	Winter (Bermuda) Ltd. (Controller)	100-789-101		Winter (Bermuda) Ltd. (Controller)	100-789-101
	Summer I Ltd.	100-314-151		Summer I Ltd.	100-314-151
Group 2	BCEG – Summer II Ltd.	456-789-CIT	Group 2	QBG – Summer II Ltd.	456-789-TCB
	Summer II Ltd. (Controller)	100-189-202		Summer II Ltd. (Controller)	100-189-202
Group 3	BCEG – Pinecone Ltd.	789-321-CIT	Group 3	QBG – Pinecone Ltd.	789-321-TCB
	Pinecone Ltd. (Controller)	100-223-242		Pinecone Ltd. (Controller)	100-223-242
Identify proposed CIT groups			Identify proposed TCB group (can only be one QBG)		
Group 1	BCEG – Winter (Bermuda) Ltd.	123-456-CIT	Group 1	QBG – Winter (Bermuda) Ltd.	123-456-TCB
	Pinecone Ltd. (Controller)*	100-223-242		Pinecone Ltd. (Controller)*	100-223-242
	Summer I Ltd.	100-314-151		Summer I Ltd.	100-314-151
	Summer II Ltd.	100-189-202		Summer II Ltd.	100-189-202
	Winter (Bermuda) Ltd.	100-789-101		Winter (Bermuda) Ltd.	100-789-101

*The Controller of the Group can be the same or different. It is the entity that files and pays on behalf of the Group.

Kind regards,
Signature of Authorised point of contact."
